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**BEFORE THE TENNESSEE REGULATORY AUTHORITY**  
**Nashville, Tennessee**  
**November 24, 2003**

In Re: *Implementation of the Federal Communications Commission's Triennial Review Order (Nine-month Proceeding) (Switching)*  
Docket No. 03-00491

**TALK AMERICA'S RESPONSES TO**  
**BELLSOUTH TELECOMMUNICATIONS, INC.'S**  
**FIRST SET OF INTERROGATORIES**

Talk America Inc. ("Talk") hereby submits its responses to BellSouth Telecommunications, Inc.'s ("BellSouth's") First Set of Interrogatories to Talk.

**INTERROGATORY 1:** Identify each switch owned by TalkAmerica that TalkAmerica uses to provide a qualifying service anywhere in Tennessee, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch).

**RESPONSE:**

Talk America does not own any switches that it uses to provide local exchange services anywhere in Tennessee. Talk America serves local customers in Tennessee exclusively through the lease of BellSouth UNE-P facilities or through resale of BellSouth services.

**INTERROGATORY 2:** For each switch identified in response to Interrogatory No. 1, please:

- (a) provide the Common Language Location Identifier ("CLLI") code of the switch;

- (b) provide the street address, including the city and state in which the switch is located;
- (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- (f) provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG"); or, state if the switch is not identified in the LERG.

**RESPONSE:**

Not applicable.

**INTERROGATORY 3:**

Identify any other switch not previously identified in Interrogatory No. 1 that TalkAmerica uses to provide a qualifying service anywhere in Tennessee, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch). In answering this Interrogatory, do not include ILEC switches used by TalkAmerica either on an unbundled or resale basis.

**RESPONSE:**

Response: None. See response to Interrogatory No. 1.

**INTERROGATORY 4:**

For each switch identified in response to Interrogatory No. 3, please:

- (a) identify the person that owns the switch;
- (b) provide the Common Language Location Identifier (“CLLI”) code of the switch;
- (c) provide the street address, including the city and state in which the switch is located;
- (d) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (e) describe in detail the arrangement by which you are making use of the switch, including stating whether you are leasing the switch or switching capacity on the switch;
- (f) identify all documents referring or relating to the rates, terms, and conditions of TalkAmerica’s use of the switch; and
- (g) provide information relating to the switch as contained in Telcordia’s Local Exchange Routing Guide (“LERG”); or, state if the switch is not identified in the LERG.

**RESPONSE:**

Not applicable.

**INTERROGATORY 5:**

Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Tennessee utilizing any of the switches identified in response to Interrogatory No. 1. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

**RESPONSE:**

Not applicable.

**INTERROGATORY 6:**

For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory 1.

**RESPONSE:**

Not applicable.

### **INTERROGATORY 7:**

With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 6, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;

- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

**RESPONSE:**

Not applicable.

**INTERROGATORY 8:**

Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Tennessee utilizing any of the switches identified in response to Interrogatory No. 3. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user is located.

**RESPONSE:**

Not applicable.

**INTERROGATORY 9:**

For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory No. 3.

**RESPONSE:**

Not applicable.

**INTERROGATORY 10:**

With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 9, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;

- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

**RESPONSE:**

Not applicable.

**INTERROGATORY 11:**

Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user



customers in Tennessee using an ILEC's switch either on an unbundled or resale basis. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

**OBJECTION:**

Talk objects to this interrogatory as this information already is in BellSouth's possession. Talk also objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations.

**INTERROGATORY 12:**

For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area using an ILEC's switch either on an unbundled or resale basis.

**OBJECTION:**

Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information.

**INTERROGATORY 13:**

With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 12, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;

- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

**OBJECTION:**

Talk incorporates its objections to interrogatory 12 above, which is a predicate to this interrogatory 13.

**INTERROGATORY 14:**

Do you offer to provide or do you provide switching capacity to another local exchange carrier for its use in providing qualifying service anywhere in the nine states in the

BellSouth region. If the answer to this Interrogatory is in the affirmative, for each switch that you use to offer or provide such switching capacity, please:

- (a) Provide the Common Language Location Identifier ("CLLI") code of the switch;
- (b) Provide the street address, including the city and state in which the switch is located;
- (c) Identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) State the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- (e) State the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- (f) Identify all documents referring or relating to the rates, terms, and conditions of TalkAmerica's provision of switching capability.

**OBJECTION:**

Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk objects to the use of the terms

“qualifying service” and “nonqualifying service” on the grounds the terms are subject to differing interpretations.

**RESPONSE:**

Notwithstanding this objection, Talk America does not offer to provide nor does it provide switching capacity to any other local exchange carrier for its use in providing local exchange services anywhere in the BellSouth region.

**INTERROGATORY 15:**

Identify every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service using: (1) the Unbundled Network Element Platform (UNE-P), (2) self-provisioned switching, (3) switching obtained from a third party provider other than an ILEC, or (4) any combination of these items.

**OBJECTION:**

Talk also objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority’s rules and procedures relating to confidential and proprietary information. Talk objects to the use of the term “business case” on the grounds the term is subject to differing interpretations. Talk also objects to

the use of the terms “qualifying service” and “nonqualifying service” on the grounds the terms are subject to differing interpretations.

**INTERROGATORY 16:**

Identify any documents that you have provided to any of your employees or agents, or to any financial analyst, bank or other financial institution, shareholder or any other person that describes, presents, evaluates or otherwise discusses in whole or part, how you intend to offer or provide local exchange service, including but not limited to such things as the markets in which you either do participate or intend to participate, the costs of providing such service, the market share you anticipate obtaining in each market, the time horizon over which you anticipate obtaining such market share, and the average revenues you expect per customer.

**OBJECTION:**

Talk assumes the interrogatory is confined to Tennessee intrastate operations, and objects to the application of any broader intent as overbroad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Talk objects to this interrogatory on the grounds that information relating to or derived from the business model of a particular carrier is irrelevant to the impairment analysis to be conducted by the Authority and the interrogatory is therefore not reasonably calculated to lead to the discovery of admissible evidence. Talk also objects on the grounds the interrogatory is overbroad, oppressive, and unduly burdensome. Talk also objects on

the grounds the interrogatory seeks the disclosure of confidential and proprietary business information.

**INTERROGATORY 17:**

If not identified in response to a prior Interrogatory, identify every document in your possession, custody, or control referring or relating to the financial viability of self-provisioning switching in your providing qualifying services to end user customers.

**OBJECTION:**

Talk interprets this interrogatory as relating to intrastate Tennessee operations within BellSouth's territory, and objects to the application of any broader intent. Talk objects to this interrogatory on the grounds that the request to identify "every" document is unduly burdensome and oppressive. Talk also objects on the grounds the interrogatory seeks information that is unrelated to and inconsistent with the impairment analysis to be conducted by the Authority, and is therefore irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Talk also objects on the grounds the interrogatory seeks the disclosure of confidential and proprietary business information.

**INTERROGATORY 18:**

Do you have switches that are technically capable of providing, but are not presently being used to provide, a qualifying service in Tennessee? If the answer to this Interrogatory is in the affirmative, please:

- (a) provide the Common Language Location Identifier (“CLLI”) code of the switch;
- (b) provide the street address, including the city and state in which the switch is located;
- (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch’s existing configuration and component parts;
- (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch’s existing configuration and component parts; and
- (f) identify any documents in your possession, custody or control that discuss, evaluate, analyze or otherwise refer or relate to whether those switches could be used to provide a qualifying service in Tennessee.

**OBJECTION:**

Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority’s rules and procedures relating to confidential and proprietary information. Talk objects to the use of the terms “qualifying service” and “nonqualifying service” on the grounds the terms are subject to differing interpretations.



**INTERROGATORY 19:**

Identify each MSA in Tennessee where you are currently offering a qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks information already in BellSouth's possession. Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations.

**RESPONSE:**

Notwithstanding Talk's objection, Talk America offers local exchange services throughout the territory served by BellSouth.

**INTERROGATORY 20:**

If you offer a qualifying service outside of the MSAs identified in response to Interrogatory 19, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks information already in BellSouth's possession. Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations.

**RESPONSE:**

Notwithstanding Talk's objection, Talk America offers local exchange services throughout the territory served by BellSouth.

**INTERROGATORY 21:**

Describe with particularity the qualifying services that you offer in the geographic areas described in response to Interrogatories 19 and 20, including the rates, terms, and conditions under which such services are offered. If the qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks information already in BellSouth's possession. Talk also objects to this interrogatory to the extent it seeks information that is publicly available. Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations.

**RESPONSE:**

Notwithstanding Talk's objection, Talk America offers local and long distance services to residential and small business subscribers throughout the territory served by BellSouth. The prices generally vary in accordance with the UNE rates zones. Talk America's website, [www.talk.com](http://www.talk.com), describes the services currently offered by Talk.

**INTERROGATORY 22:**

Identify each MSA in Tennessee where you are currently offering a non-qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks information already in BellSouth's possession. Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations

### **INTERROGATORY 23:**

If you offer a non-qualifying service outside of the MSAs identified in response to Interrogatory 22, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

### **OBJECTION:**

Talk objects to this interrogatory to the extent it seeks information already in BellSouth's possession. Talk also objects to this interrogatory to the extent it seeks information that is publicly available. Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations.

### **INTERROGATORY 24:**

Describe with particularity the non-qualifying services that you offer in the geographic areas described in response to Interrogatories 22 and 23, including the rates, terms, and conditions under which such services are offered. If the non-qualifying services you offer in those areas vary by area, provide a separate statement of services offered and

the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks information already in BellSouth's possession. Talk also objects to this interrogatory to the extent it seeks information that is publicly available. Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations.

**INTERROGATORY 25:**

Please state the total number of end users customers in the State of Tennessee to whom you only provide qualifying service.

**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks information already in BellSouth's possession. Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations.

**RESPONSE:**

Notwithstanding Talk's objection, as of September 20, 2003, Talk America provided local exchange service to 1,132 customers in Tennessee. Most, if not all, of these customers subscribe to Talk's bundled local/long distance services.

**INTERROGATORY 26:**

For those end user customers to whom you only provide qualifying service in the State of Tennessee, please state the average monthly revenues you receive from each such end user customer.

**OBJECTION:**

Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk also objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations

**INTERROGATORY 27:**

For those end user customers to whom you only provide qualifying service in the State of Tennessee, please state the average number of lines that you provide each such end user customer.

**OBJECTION:**

Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk also objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations.



**RESPONSE:**

Notwithstanding Talk's objection, as of September 30, 2003, the average number of lines per end user customer in Tennessee was 1.12.

**INTERROGATORY 28:**

Please state the total number of end users customers in the State of Tennessee to whom you only provide non-qualifying service.

**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks information already in BellSouth's possession. Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations.

**INTERROGATORY 29:**

For those end user customers to whom you only provide non-qualifying service in the State of Tennessee, please state the average monthly revenues you receive from each such end user customer.

**OBJECTION:**

Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk also objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations.

**INTERROGATORY 30:**

Please state the total number of end users customers in the State of Tennessee to whom you provide both qualifying and non-qualifying service.

**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks information already in BellSouth's possession. Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations.

**RESPONSE:**

Notwithstanding Talk's objection, see Talk America's response to Interrogatory No.

**INTERROGATORY 31:**

For those end user customers to whom you provide qualifying and non-qualifying service in the State of Tennessee, please state the average monthly revenues you receive from each such end user customer.

**OBJECTION:**

Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk also objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations.

**INTERROGATORY 32:**

For those end user customers to whom you provide qualifying and non-qualifying service in the State of Tennessee, please state the average number of lines that you provide each such end user customer.

**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks information already in BellSouth's possession. Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations.

**RESPONSE:**

Notwithstanding Talk's objection, please see Talk America's response to Interrogatory 27.

**INTERROGATORY 33:**

Please provide a breakdown of the total number of end user customers served by TalkAmerica in Tennessee by class or type of end user customers (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers. For each such classification, and/or if you provide another type of classification, define and describe with specificity the classification so that it can be determined what kinds of customers you have in each classification).

**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks information already in BellSouth's possession. Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations.

**RESPONSE:**

Notwithstanding Talk's objection, as of September 30, 2003, Talk America was providing local service to 1,061 residential customers and 71 business customers in Tennessee.

**INTERROGATORY 34:**

For each class or type of end user customer referenced in Interrogatory No. 33, please state the average acquisition cost for each such end user class or type. Please provide this information for each month from January 2000 to the present.

**OBJECTION:**

Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be

disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk also objects to the use of the term "average acquisition cost" on the grounds the term is subject to differing interpretations.

**INTERROGATORY 35:**

For each class or type of end user customer referenced in Interrogatory No. 33, please state the typical churn rate for each such end user class or type. Please provide this information for each month from January 2000 to the present.

**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks information already in BellSouth's possession. Talk also objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk objects to the use of the term "churn rate" on the grounds the term is subject to differing interpretations.

**INTERROGATORY 36:**

For each class or type of end user customer referenced in Interrogatory No. 33, please state the share of the local exchange market you have obtained. Please provide this information for each month from January 2000 to the present.

**OBJECTION:**

Talk incorporates its objections to interrogatory 33 above.

**INTERROGATORY 37:**

Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to your cumulative market share of the local exchange market in Tennessee.

**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks information already in BellSouth's possession. Talk also objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information.

**INTERROGATORY 38:**

Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to any projections that you have made regarding your cumulative market share growth in the local exchange market in Tennessee.

**OBJECTION:**

Talk objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information.

**INTERROGATORY 39:**

Describe how the marketing organization that is responsible for marketing qualifying service in Tennessee is organized, including the organization's structure, size in terms of full time or equivalent employees including contract and temporary employees, and the physical work locations for such employees. In answering this Interrogatory, please state whether you utilize authorized sales representatives in your marketing efforts in Tennessee, and, if so, describe with particularity the nature, extent, and rates, terms, and conditions of such use.

**OBJECTION:**

Talk also objects to this interrogatory because it seeks information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed only pursuant to the terms of a mutually acceptable confidentiality agreement and the Authority's rules and procedures relating to confidential and proprietary information. Talk also objects to this interrogatory on the grounds it seeks information that is unrelated to the analysis the Authority is to conduct,



irrelevant to the issues in the case, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY 40:**

How do you determine whether you will serve an individual customer's location with multiple DSOs or whether you are going to use a DS1 or larger transmission system? Provide a detailed description of the analysis you would undertake to resolve this issue, and identify the factors that you would consider in making this type of a decision.

**RESPONSE:**

Talk America currently markets its services only to residential and small business customers, and does not serve customers with DS1 or larger transmission facilities. Therefore, Talk America does not undertake the kind of analysis described in this interrogatory.

**INTERROGATORY 41:**

Is there a typical or average number of DSOs at which you would chose to serve a particular customer with a DS1 or larger transmission system, all other things being equal? If so, please provide that typical or average number and explain how this number was derived.

**RESPONSE:**

Response: Not applicable. See Talk America's response to Interrogatory No. 40.

**INTERROGATORY 42:**

What additional equipment, if any, would be required (on the customer's side of the demarcation point rather than on network side of the demarcation point) to provide service to a customer with a DS1 rather than multiple DS0s? For instance, if a customer had 10 DS0s, and you want to provide the customer with the same functionality using a DS1, would a D-4 channel bank, or a digital PBX be required in order to provide equivalent service to the end user that has 10 DS0s? If so, please provide the average cost of the equipment that would be required to provide that functional equivalency (that is, the channel bank, or the PBX or whatever would typically be required should you decide to serve the customer with a DS1 rather than multiple DS0s.)

**RESPONSE:**

Response: Not applicable. See Talk America's response to Interrogatory No. 40.

**INTERROGATORY 43:**

What cost of capital do you use in evaluating whether to offer a qualifying service in a particular geographic market and how is that cost of capital determined?

**OBJECTION:**

Talk objects on the grounds the interrogatory seeks the disclosure of confidential and proprietary business information. Talk objects to the use of the terms "qualifying

service” and “nonqualifying service” on the grounds the terms are subject to differing interpretations. Talk objects to the use of the term “cost of capital” on the grounds the term is subject to differing interpretations.

**INTERROGATORY 44:**

With regard to the cost of capital you use in evaluating whether to provide a qualifying service in a particular geographic market, what are the individual components of that cost of capital, such as the debt-equity ratio, the cost of debt and the cost of equity?

**OBJECTION:**

Talk objects on the grounds the interrogatory seeks the disclosure of confidential and proprietary business information. Talk objects to the use of the terms “qualifying service” and “nonqualifying service” on the grounds the terms are subject to differing interpretations. Talk objects to the use of the term “cost of capital” on the grounds the term is subject to differing interpretations. Talk also objects to this interrogatory on the grounds it seeks information that is unrelated to the analysis the Authority is to conduct, irrelevant to the issues in the case, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY 45:**

In determining whether to offer a qualifying service in a particular geographic market, what time period do you typically use to evaluate that offer? That is, do you use one

year, five years, ten years or some other time horizon over which you evaluate the project?

**OBJECTION:**

Talk objects on the grounds the interrogatory seeks the disclosure of confidential and proprietary business information. Talk objects to the use of the terms “qualifying service” and “nonqualifying service” on the grounds the terms are subject to differing interpretations. Talk also objects to this interrogatory on the grounds it seeks information that is unrelated to the analysis the Authority is to conduct, irrelevant to the issues in the case, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY 46:**

Provide your definition of sales expense as that term is used in your business.

**OBJECTION:**

Talk objects to the use of the term “sales expense” on the grounds the term is subject to differing interpretations. Talk also objects to this interrogatory on the grounds it seeks information that is unrelated to the analysis the Authority is to conduct, irrelevant to the issues in the case, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY 47:**

Based on the definition of sales expense in the foregoing Interrogatory, please state how you estimate sales expense when evaluating whether to offer a qualifying service in a particular geographic market?

**OBJECTION:**

Talk objects to the use of the term “sales expense” on the grounds the term is subject to differing interpretations. Talk also objects to the use of the terms “qualifying service” and “nonqualifying service” on the grounds the terms are subject to differing interpretations. Talk objects to this interrogatory on the grounds it seeks information that is unrelated to the analysis the Authority is to conduct, irrelevant to the issues in the case, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY 48:**

Provide your definition of general and administrative (G&A) costs as you use those terms in your business.

**OBJECTION:**

Talk objects to the use of the term “general and administrative (G&A)” on the grounds the term is subject to differing interpretations. Talk also objects to this interrogatory on the grounds it seeks information that is unrelated to the analysis the Authority is to

conduct, irrelevant to the issues in the case, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY 49:**

Based on the definition of G&A costs in the foregoing Interrogatory, please state how you estimate G&A expenses when evaluating whether to offer a qualifying service in a particular geographic market?

**OBJECTION:**

Talk objects to the use of the term “general and administrative (G&A)” on the grounds the term is subject to differing interpretations. Talk objects to the use of the term “sales expense” on the grounds the term is subject to differing interpretations. Talk also objects to the use of the terms “qualifying service” and “nonqualifying service” on the grounds the terms are subject to differing interpretations. Talk objects to this interrogatory on the grounds it seeks information that is unrelated to the analysis the Authority is to conduct, irrelevant to the issues in the case, and not reasonably calculated to lead to the discovery of admissible evidence.

**INTERROGATORY 50:**

For each day since January 1, 2000, identify the number of individual hot cuts that BellSouth has performed for TalkAmerica in each state in BellSouth’s region.

**RESPONSE:**

None.

**INTERROGATORY 51:**

For each individual hot cut identified in response to Interrogatory No. 50, state:

- (a) Whether the hot cut was coordinated or not;
- (b) If coordinated, whether the hot cut occurred as scheduled;
- (c) If the hot cut did not occur as scheduled, state whether this was due to a problem with BellSouth, TalkAmerica, the end-user customer, or some third party, and describe with specificity the reason the hot cut did not occur as scheduled;
- (d) If there was a problem with the hot cut, state whether TalkAmerica complained in writing to BellSouth or anyone else.

**RESPONSE:**

Not applicable.

**INTERROGATORY 52:**

Does TalkAmerica have a preferred process for performing batch hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with

particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

**RESPONSE:**

Talk America does not have any experience in performing batch hot cuts and has not developed a "preferred process" to date.

**INTERROGATORY 53:**

Does TalkAmerica have a preferred process for performing individual hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

**RESPONSE:**

No. See Talk America's response to Interrogatory No. 52.

**INTERROGATORY 54:**

State whether TalkAmerica agrees that it jointly developed BellSouth's process for individual hot cuts with BellSouth as set forth in the parties' April 16, 2001 Memorandum of Understanding. If TalkAmerica does not agree, explain why and explain TalkAmerica's view of its involvement in the development of that process.



**RESPONSE:**

No. Talk America was not involved in the development of BellSouth's process for individual hot cuts.

**INTERROGATORY 55:**

If TalkAmerica has a preferred process for individual hot cuts that differs from BellSouth's process, identify each specific step in TalkAmerica's process that differs from BellSouth's process.

**RESPONSE:**

Not applicable. See Talk America's response to Interrogatory No. 52.

**INTERROGATORY 56:**

If TalkAmerica has a preferred process for bulk hot cuts that differs from BellSouth's process, identify each specific step in TalkAmerica's process that differs from BellSouth's process.

**RESPONSE:**

Not applicable. See Talk America's response to Interrogatory No. 52.

**INTERROGATORY 57:**

Does TalkAmerica have any estimates of what a typical individual hot cut should cost?

If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

**RESPONSE:**

To date, Talk America has not developed such an estimate.

**INTERROGATORY 58:**

Does TalkAmerica have any estimates of what a typical bulk hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

**RESPONSE:**

Response: To date, Talk America has not developed any such estimates.

**INTERROGATORY 59:**

What is the largest number of individual hot cuts that TalkAmerica has requested in any individual central office in each of the nine BellSouth states on a single day? In answering this Interrogatory, identify the central office for which the request was made, and the number of hot cuts that were requested. State with specificity what the outcome was for each of the hot cuts in each of the central offices so described, if not provided in response to an earlier interrogatory.

**RESPONSE:**

None.

**INTERROGATORY 60:**

Does any ILEC in the BellSouth region have a batch hot cut process that is acceptable to TalkAmerica or that TalkAmerica believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

**RESPONSE:**

Talk America has no experience with and has not evaluated ILEC batch hot cut processes in the BellSouth region and, therefore, has not developed an opinion as to

whether there are any that would be acceptable to Talk America or that are superior to Bell South's process.

**INTERROGATORY 61:**

Does any ILEC in the BellSouth region have a cost for a batch hot cut process that is acceptable to TalkAmerica? If so, name the ILEC and provide the rate and the source of the rate.

**RESPONSE:**

Talk America has no experience with and has not evaluated the costs for ILEC batch hot cut processes in the BellSouth region.

**INTERROGATORY 62:**

Does any ILEC in the BellSouth region have an individual hot cut process that is acceptable to TalkAmerica or that TalkAmerica believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

**RESPONSE:**

Talk America has no experience with and has not evaluated ILEC individual cut processes in the BellSouth region and, therefore, has not developed an opinion as to whether there are any that would be acceptable to Talk America or that are superior to Bell South's process.

**INTERROGATORY 63:**

Does any ILEC in the BellSouth region have a rate for an individual hot cut process that is acceptable to TalkAmerica? If so, name the ILEC and provide the rate and the source of the rate.

**RESPONSE:**

Talk America has no experience with and has not evaluated the rates for ILEC individual hot cut processes in the BellSouth region.

**INTERROGATORY 64:**

Does any ILEC outside the BellSouth region have a batch hot cut process that is acceptable to TalkAmerica or that TalkAmerica believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

**RESPONSE:**

Talk America has no experience with and has not evaluated ILEC batch hot cut processes outside the BellSouth region and, therefore, has not developed an opinion as to whether there are any that would be acceptable to Talk America or that are superior to Bell South's process.

**INTERROGATORY 65:**

Does any ILEC outside the BellSouth region have a rate for a batch hot cut process that is acceptable to TalkAmerica? If so, name the ILEC and provide the rate and the source of the rate.

**RESPONSE:**

Talk America has no experience with and has not evaluated the rates for ILEC batch hot cut processes outside the BellSouth region.

**INTERROGATORY 66:**

Does any ILEC outside the BellSouth region have an individual hot cut process that is acceptable to TalkAmerica or that TalkAmerica believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the

ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

**RESPONSE:**

Talk America has no experience with and has not evaluated ILEC individual cut processes outside the BellSouth region and, therefore, has not developed an opinion as to whether there are any that would be acceptable to Talk America or that are superior to Bell South's process.

**INTERROGATORY 67:**

Does any ILEC outside the BellSouth region have a rate for an individual hot cut process that is acceptable to TalkAmerica? If so, name the ILEC and provide the rate and the source of the rate.

**RESPONSE:**

Talk America has no experience with and has not evaluated the rates for ILEC individual hot cut processes outside the BellSouth region.

**INTERROGATORY 68:**

Does TalkAmerica order coordinated or non-coordinated hot cuts?

**RESPONSE:**

Talk America has not ordered any hot cuts from BellSouth.

**INTERROGATORY 69:**

Does TalkAmerica use the CFA database?

**RESPONSE:**

No.

**INTERROGATORY 70:**

Identify every issue related to BellSouth's hot cut process raised by TalkAmerica at the Tennessee CLEC collaborative since October 2001.

**RESPONSE:**

Talk America provides service in Tennessee exclusively via UNE-P or resale and, therefore, has not required hot cuts. It has not participated in the Tennessee CLEC collaborative.



**INTERROGATORY 71:**

What is the appropriate volume of loops that you contend the Tennessee Regulatory Authority ("TRA") should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks a legal conclusion.

**INTERROGATORY 72:**

What is the appropriate process that you contend the TRA should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks a legal conclusion.

**INTERROGATORY 73:**

If TalkAmerica disagrees with BellSouth's individual hot cut process, identify every step that TalkAmerica contends is unnecessary and state with specificity why the step is unnecessary.

**RESPONSE:**

Talk America has no experience with BellSouth's individual hot cut process and has not developed an opinion as to what steps in that process may be unnecessary.

**INTERROGATORY 74:**

If TalkAmerica disagrees with BellSouth's bulk hot cut process, identify every step that TalkAmerica contends is unnecessary and state with specificity why the step is unnecessary.

**RESPONSE:**

Talk America has no experience with BellSouth's bulk hot cut process and has not developed an opinion as to what steps in that process may be unnecessary.

**INTERROGATORY 75:**

Identify by date, author and recipient every written complaint TalkAmerica has made to BellSouth regarding BellSouth's hot cut process since October 2001.

**RESPONSE:**

Response: Talk America provides service in Tennessee exclusively via UNE-P or resale and, therefore, has not requested any hot cuts from BellSouth. It has therefore not made any written complaints to BellSouth regarding the process.

**INTERROGATORY 76:**

How many unbundled loops does TalkAmerica contend BellSouth must provision per state per month to constitute sufficient volume to assess BellSouth's hot cut process?

**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks a legal conclusion.

**INTERROGATORY 77:**

What is the appropriate information that you contend the TRA should consider in evaluating whether the ILEC is capable of migrating multiple lines served using unbundled local circuit switching to switches operated by a carrier other than the ILEC in a timely manner in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

**OBJECTION:**

Talk objects to this interrogatory to the extent that seeks a legal conclusion.

**INTERROGATORY 78:**

What is the average completion interval metric for provision of high volumes of loops that you contend the TRA should require in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

**OBJECTION:**

Talk objects to this request to the extent it seeks a legal conclusion.

**INTERROGATORY 79:**

What are the rates that you contend the TRA should adopt in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks a legal conclusion.

**INTERROGATORY 80:**

What are the appropriate product market(s) that you contend the TRA should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks a legal conclusion.

**INTERROGATORY 81:**

What are the appropriate geographic market(s) that you contend the TRA should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

**OBJECTION:**

Talk objects to this request to the extent it seeks a legal conclusion.

**INTERROGATORY 82:**

Do you contend that there are operational barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(2) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with

particularity each such operational barrier, and state all facts and identify all documents supporting your contention.

**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks a legal conclusion.

**INTERROGATORY 83:**

Do you contend that there are economic barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(3) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such economic barrier, and state all facts and identify all documents supporting your contention.

**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks a legal conclusion.

**INTERROGATORY 84:**

What is the maximum number of DS0 loops for each geographic market that you contend requesting telecommunications carriers can serve through unbundled switching when serving multiline end users at a single location that the TRA should consider in

establishing a "cutoff" consistent with FCC Rule 51.319(d)(2)(iii)(B)(4)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

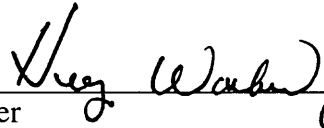
**OBJECTION:**

Talk objects to this interrogatory to the extent it seeks a legal conclusion.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: \_\_\_\_\_

  
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